

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FRONTIER AIRLINES, INC.,

Plaintiff,

v.

AMCK AVIATION HOLDINGS IRELAND
LIMITED, ACCIPITER INVESTMENT 4
LIMITED, VERMILLION AVIATION (TWO)
LIMITED, ACCIPITER HOLDINGS DAC,
CARLYLE AVIATION MANAGEMENT
LIMITED, MAVERICK AVIATION HOLDINGS
LTD., MANCHESTER AVIATION FINANCE
S.a.r.l., VERMILLION AVIATION HOLDINGS
LIMITED, WELLS FARGO TRUST COMPANY,
N.A., solely in its capacity as OWNER TRUSTEE,
and UMB BANK, N.A., solely in its capacity as
OWNER TRUSTEE,

Defendants.

22 Civ. 2943 (PAE)

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the annexed Declaration of Jeff E. Butler dated October 7, 2022 (and accompanying exhibits) and the accompanying Memorandum of Law, Defendants AMCK Aviation Holdings Ireland Limited (“AMCK”), Accipiter Investments Aircraft 4 Limited (“Accipiter”), Vermillion Aviation (Two) Limited (“Vermillion”), Accipiter Holdings DAC (“Accipiter Holdings”), Carlyle Aviation Management Limited (“Carlyle Aviation”), Maverick Aviation Holdings Ltd. (“Maverick”), Manchester Aviation Finance S.a.r.l. (“Manchester”), UMB Bank, N.A., not in its individual capacity but solely as owner trustee (“UMB”) and Wells Fargo Trust Company, N.A., not in its individual capacity but solely as owner trustee (“Wells Fargo”) (collectively, “Defendants”), hereby respectfully move this Court, before the Honorable Paul A. Engelmayer, United States District Judge for the Southern District

of New York, for an order pursuant to Rule 12 of the Federal Rules of Civil Procedure dismissing the Second Amended Complaint in this action and granting such further relief as the Court deems proper and just.

Dated: October 7, 2022
New York, New York

Respectfully submitted,

s/ Jeff E. Butler

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